

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Case No. **1:21-MJ-00835**

Priority Mail Express parcel label number 9470 1368 9523 2557 2956 82,
postmarked November 8, 2021, addressed Emily Anusbigain, 18 Edgewood Dr,
Fort Thomas KY 41075-2013 with a return address of Padgett Business Services
Denver, 50 S Steele Street Suite 588, Denver CO 80209

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Priority Mail Express parcel label number 9470 1368 9523 2557 2956 82

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

Controlled Substances, materials and documents reflecting the distribution of controlled substances through the U.S. Mails, including money and/or monetary instruments paid for controlled substances

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of: Title 21

| Code Section | Offense Description |
|----------------------------|--|
| 841 (a) (1), 843 (b) & 846 | Conspiracy to distribute a controlled substance Possession with intent to distribute a controlled substance |

The application is based on these facts:

See attached affidavit of U.S. Postal Inspector O'Neill

- ☒ Continued on the attached sheet.
☐ Delayed notice _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



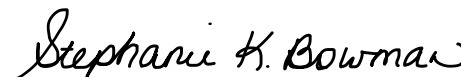
Applicant's signature

Karen L. O'Neill, U. S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.
via electronic means, specifically Facetime video.

Date: Nov 10, 2021



Judge's signature



City and state: Cincinnati, Ohio

Honorable Stephanie K. Bowman
United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, KAREN O'NEILL, HAVING BEEN DULY SWORN, DEPOSE AND STATE: I am a United States Postal Inspector, having been so employed since March 2003.

1. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the Postal Inspection Service with investigative responsibility for southwest Ohio, northern Kentucky, and southeast Indiana. Part of my investigative responsibility involves the use of the United States Mail in the transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.

2. Your affiant has become aware that drug traffickers frequently use Express Mail, a business-oriented overnight service offered by the United States Postal Service, to transport narcotics and other dangerous controlled substances, and their proceeds or instrumentalities from the sale of the controlled substances. Your affiant has also become aware that drug traffickers frequently use Priority Mail with delivery confirmation, a 2-3 day service offered by the United States Postal Service. As a result of investigations and successful controlled substance prosecutions where the mail was used, your affiant has learned of certain characteristics indicative of other mail items previously identified as containing narcotics or other dangerous controlled substances, their proceeds or instrumentalities from the sale of the controlled substances. Some of these characteristics include, but are not necessarily limited to or used on every occasion, the mailer using different post offices on the same day to send parcels, false or non-existent return address, addressee is not known to receive mail at the listed delivery or sender address, the package is heavily taped, the package is mailed from a known drug source location, labeling information contains misspellings, unusual odors emanating from the package, and the listed address is located in an area of known or suspected drug activity.

3. On or about November 9, 2021, Priority Mail Express parcel label number 9470 1368 9523 2557 2956 82 (SUBJECT PARCEL) was located at the Postal Processing & Distribution Center (P&DC), Cincinnati, Ohio. The parcel is addressed to Emily Anusbigain, 18 Edgewood Dr, Fort Thomas KY 41075-2013 (SUBJECT ADDRESS) with a return address of Padgett Business Services Denver, 50 S Steele Street Suite 588, Denver CO 80209. The SUBJECT PARCEL is coming from Denver, Colorado, a known drug source area.

4. Your affiant knows that on November 6, 2021 a Priority Mail Express parcel mailed from Denver, Colorado was delivered to the SUBJECT ADDRESS. That parcel was addressed to Emily Anusbgian with a return address of Invoice Factoring – Denver Co, 55 Madison Street, Denver CO 80206. This parcel and the SUBJECT PARCEL have the same type pre-printed label with a different business return address.

5. Your affiant knows the SUBJECT ADDRESS received 4 parcels from Denver, Colorado in July 2021.

6. Your affiant did a check in CLEAR regarding the addressee address on the SUBJECT PARCEL. CLEAR is a database that is used by law enforcement as a tool to identify person/business and address information. According to CLEAR, the name "Anusbgian" is associated with 18 Edgewood Dr, Fort Thomas, KY 41075-2013. The name is misspelled on the SUBJECT PARCEL and the aforementioned parcel that was delivered on November 6, 2021.

7. Your affiant did a check in CLEAR regarding the return address on the SUBJECT PARCEL. According to CLEAR, "Padgett Business Services" is associated with 50 S Steele Street Suite 588, Denver CO 80209.

8. Your affiant contacted "Padgett Business Services" at the number listed on their CLEAR report – (303) 331-1233. Your affiant spoke to one of the owners of the business who stated, in substance and in part, that they did not mail this parcel to Fort Thomas, Kentucky. He also stated that they would not put "Denver" after their business name on the return address.

9. On or about November 10, 2021, you affiant contacted Cincinnati Police Department Specialist Mike Harper to arrange for a narcotic canine to check the SUBJECT PARCEL. Specialist Harper responded to the U.S. Postal Inspection Service (USPIS) Field office, Cincinnati, Ohio where the parcel was placed in a controlled area and presented to narcotic canine, "Cairo". "Cairo" alerted positively to the presence or odor of a controlled substance or their proceeds or instrumentalities upon the SUBJECT PARCEL. Your affiant knows that Specialist Harper and narcotic canine "Cairo" train regularly and are certified annually through the Ohio Peace Officer Training Academy. Your affiant has presented countless parcels to Specialist Harper and canine "Cairo" which has resulted in successful seizures of a quantity of a narcotic or other dangerous controlled substance and their proceeds or instrumentalities

therefore your affiant considers them to be reliable. Attached herewith, and made part hereof by reference, is a photocopy of the narcotic canine handler's record of examination.

10. The SUBJECT PARCEL is further identified as follows: a U.S. Postal Service Priority Mail Express cardboard envelope 12 1/2" x 9 1/2" in size, bearing label number 9470 1368 9523 2557 2956 82, postmarked November 8, 2021; see address information below:

Sender: Padgett Business Services Denver
50 S Steele Street
Suite 588
Denver CO 80209

Addressee: Emily Anusbigain
18 Edgewood Dr
Fort Thomas KY 41075-2013

11. This information along with the positive alert of narcotic canine "Cairo" is indicative of a drug package or its proceeds.

12. Based on the information contained herein, your affiant believes that contained in the SUBJECT PARCEL is a quantity of a narcotic or other dangerous controlled substance, their proceeds or instrumentalities.

13. The SUBJECT PARCEL is being secured at the USPIS Field Office, Cincinnati, Ohio pending further investigation.

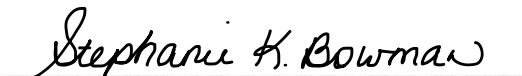
Therefore, a search warrant to open the SUBJECT PARCEL is requested.

Further, your affiant sayeth naught.



Karen O'Neill
Postal Inspector

Subscribed and sworn to and before me this 10 day of November, 2021.



Honorable Stephanie K. Bowman
United States Magistrate Judge





United States Postal Inspection Service
Pittsburgh Division

OFFICER AFFIDAVIT

I, Mike Harper, am and have been employed by the Cincinnati Police Department since 2001. Among other duties, I am currently the assigned handler of narcotics detection canine "Cairo" which is trained and certified in the detection of the presence or odor of narcotics described as follows:

marijuana, cocaine, methamphetamine and heroin

On 11-10-21, at the request of Postal Inspector K. O'Neill, I responded to Cincinnati Postal Inspection Service office, where "Cairo" did alert to and indicate upon:

[describe item]

9470 1368 9523 2557 2956 82 addressed to
Emily Anusbigain 18 Edgewood Dr Port Thomas
Vy 41075-2013 return Padgett Business Services
Denver 50 S Steele Street Suite 588 Denver CO
80204

Which, based upon my training and experience and that of "Cairo", indicates there is contained within or upon the above described item, the presence or odor of a narcotic or other controlled substance.

Mike Harper 11/10/21
(Signature and Date)

U. Neill 11/10/21
(Signature and Date)